

UNITED STATES DISTRICT COURT

for the

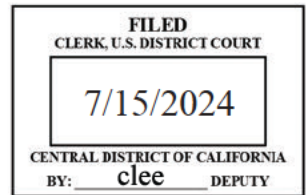
Central District of California

United States of America

v.

Cross Arjay Goree,
 aka "C3",
 Kenneth Gilmore III,
 aka "Kenny,"
 Brendan Markel Hawkins,
 Calvin Logan Gray,
 Kendall Eric Johnson,
 aka, "K3," and
 Caine Aiden Goree,

Defendants

Case No. **8:24-mj-00301-DUTY**

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of July 13, 2024, in the county of Orange, in the Central District of California, the defendants violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 371, 922(u)	Conspiracy to Steal Firearms from the Premises of a Federal Firearms Licensee

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: July 15, 2024City and state: Los Angeles, California

AUSAs: BRITTNEY M. HARRIS, KYLE W. KAHAN

/s/
 Complainant's signature

Jannah R. Holden, Special Agent
 Printed name and title

[Signature]
 Judge's signature

Hon. Steve Kim, U.S. Magistrate Judge
 Printed name and title



AFFIDAVIT

I, Jannah R. Holden, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrants against Cross Arjay GOREE, also known as "C3," Kenneth GILMORE III, aka "Kenny," Brendan Markel HAWKINS, Calvin Logan GRAY, Kendall Eric JOHNSON, aka "K3," and Caine Aiden GOREE, for a violation of 18 U.S.C. §§ 371, 922(u): Conspiracy to Steal Firearms from the Premises of a Federal Firearms Licensee.

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF JANNAH R. HOLDEN

3. I am a Special Agent ("SA") with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), United States Department of Justice, and have been so employed since 2020. I am a graduate of the Federal Law Enforcement Training Center ("FLETC") in Glynco, Georgia, and have completed the ATF National Academy's Special Agent Basic Training course. I am

currently assigned to the ATF Los Angeles Division, Glendale V Field Office, in Glendale, California.

4. I received a Bachelor of Science degree in Criminal Justice from Old Dominion University in Norfolk, Virginia and a Master of Science Degree in Criminology from Boston University in Boston, Massachusetts. I served in the United States Navy and honorably separated in 2004 at the rank of Petty Officer Second Class. I thereafter worked for seven years with the Federal Bureau of Investigation in Norfolk, Virginia and Los Angeles, California. Prior to becoming a Special Agent with the ATF, I served as a Special Agent with the Naval Criminal Investigative Service for approximately three years.

5. My primary duties as an ATF Special Agent include the enforcement of federal firearms and explosives laws. I have participated in investigations involving the illegal possession of firearms, illegal sale of firearms by both prohibited and non-prohibited persons, and illegal acquisition of firearms by both prohibited and non-prohibited persons. I also have participated in investigations involving the possession and distribution of illegal narcotics. In this realm, I have authored affidavits for search warrants, which have yielded evidence of federal criminal violations.

6. During my career in law enforcement, I have personally conducted and/or assisted in investigations of criminal acts involving Title 18, United States Code, Section 933(a)(1) (trafficking in firearms); Title 18, United States Code, Section 922(a)(1)(A) (dealing of firearms without a license); Title 18,

United States Code, Section 371 (conspiracy to commit an offense); Title 26, United States Code, Section 5861(d) (possession of unregistered NFA weapon); and Title 21, United States Code, Section 841 (possession of controlled substance with intent to distribute). As part of those investigations, I have conducted or personally participated in both physical and electronic surveillance. I have been involved in the execution of search and arrest warrants. I have conducted and personally participated in debriefing defendants, co-conspirators, and witnesses that have been involved in the unlawful possession, sale, and distribution of firearms and controlled substances. Through these investigations, I have also gained experience working directly with confidential informants and sources of information.

7. Through my training, experience, investigations, and conversations with other law enforcement personnel, I have become familiar with the manner in which members of a criminal enterprise communicate, contact each other, and use electronic communications to store, transmit, and distribute information to one another and how they plan, organize, and carry out their criminal activities. I am aware that it is a common practice for those involved in the burglary of Federal Firearms Licensees ("FFL") and/or the illegal theft, purchase, sale, trafficking, and/or possession of firearms to work in concert with other individuals and to do so by utilizing social networking and messaging applications through digital devices such as tablets, cellular telephones, and computers. Typically, those

individuals involved in the illegal theft, purchase, sale, trafficking, and/or possession of firearms are in digital or telephonic contact with co-conspirators during the planning and execution of the criminal enterprise during which time they receive ongoing information through a variety of means. The communication commonly continues after the execution of the criminal activity in order to avoid detection by law enforcement, especially after some co-conspirators are caught by law enforcement. I am also familiar with phone location data and GPS location tracking data, which can show patterns of movement by conspirators who are involved in illegal theft, purchase, sale, trafficking, and/or possession of firearms.

III. SUMMARY OF PROBABLE CAUSE

8. The ATF, Ventura County Sheriff's Office, San Diego Sheriff's Department, Riverside County Sheriff's Office, Orange Police Department, Orange County Violent Crimes Task Force, and other law enforcement agencies are investigating a string of burglaries and attempted burglaries of firearms stores that have been committed throughout Ventura, Orange, Riverside, and San Diego counties. The burglaries and attempted burglaries are similar in nature and techniques used, and are believed to be committed by the same group of individuals. The conspirators steal vehicles, use the stolen vehicles to ram into firearm stores in the middle of the night in order to gain entry into the closed businesses, and steal firearms. The stolen firearms have later been found in the possession of others. Based on the investigation, law enforcement believes that defendants Cross

Arjay GOREE, also known as "C3" ("CROSS"), Caine Aiden GOREE ("CAINE"), Kenneth GILMORE III, aka "Kenny" ("GILMORE"), Brendan Markel HAWKINS ("HAWKINS"), Calvin Logan GRAY ("GRAY"), and Kendall Eric JOHNSON, aka "K3," ("JOHNSON") are involved in the string of burglaries and attempted burglaries, including of: (1) Chaparral Coin and Gun in Murrieta, California on October 9, 2023, where 43 firearms were stolen; (2) Poway Gun and Weapon in Poway, California on March 25, 2024, where 78 firearms were stolen; (3) Ammo Bros in Ontario, California on June 12, 2024 (attempted); (4) Fallbrook Guns and Ammo in Fallbrook, California on June 13, 2024 (attempted); (5) Firearms Unknown in Oceanside, California on June 17, 2024, where 33 firearms were stolen; (6) Ammo Bros in Riverside, California on June 18, 2024, where 25 firearms were stolen; (7) Camarillo Gun Store in Camarillo, California on July 1, 2024, where 63 firearms were stolen; (8) Smokin Barrel Gun Store in Simi Valley, California on July 9, 2024 (attempted); and (9) Fowler's Gun Room in Orange, California, on July 13, 2024, where 70 firearms were stolen.¹

IV. STATEMENT OF PROBABLE CAUSE

9. Based on my review of law enforcement reports, conversations with other law enforcement agents, witness interviews, video surveillance footage, cell phone evidence, phone and GPS location information, and my own knowledge of the investigation, I am aware of the following:

¹ All dates, times, and amounts referenced in this affidavit are approximate.

A. Chaparral Coin and Gun Burglary on October 9, 2023

10. On October 9, 2023, at 12:56 a.m., Chaparral Coin and Gun LLC ("Chaparral"), a firearms store located at 24710 Washington Ave. #1, in Murrieta, California and licensed with the ATF as a Federal Firearms Licensee ("FFL"), was burglarized. Based on a review of surveillance footage, interviews and other evidence, investigators determined that a stolen Kia Optima was used to ram the door of the business and gain entry. Four burglars went inside, and together stole 43 firearms before fleeing. The burglars were wearing long pants, hoods, masks, and some had gloves on.

11. Based on an inventory of the firearms stolen provided to law enforcement by Chaparral and preliminary checks of those firearm manufacturers, at least one of the firearms was manufactured outside of California, and therefore, in order to be at Chaparral's business, had necessarily been transported in interstate and/or foreign commerce.

12. On October 13, 2023, during a search of HAWKINS's residence, pursuant to his probation conditions and a subsequent state search warrant, three of the stolen Chaparral firearms were found inside, along with clothing matching of one of the burglars. During a Mirandized interview, HAWKINS admitted to being involved in the burglary and identified himself in a still frame image from the surveillance video.

13. On October 13, 2023, HAWKINS was arrested for violations of California Penal Code Sections 459 (burglary), 496(a) (receiving stolen property), and 182(a) (conspiracy to

commit a crime). That case is pending in Riverside Superior Court.

1. Further Investigation

14. On July 13, 2024, during a search of the Courtney Lane Residence (further described later in this affidavit and is where CROSS, CAINE, and JOHNSON are believed to reside), law enforcement recovered a Glock 22, .40 S&W caliber pistol bearing a serial number matching a firearm stolen from Chaparral Coin and Gun.

B. Poway Weapons and Gear Burglary on March 25, 2024

15. On March 25, 2024, around 3:11 a.m., Poway Weapons and Gear ("PWG"), a firearms store located at 1355 Danielson Street, in Poway, California and licensed as an FFL, was burglarized. Based on a review of surveillance footage, witness interviews and other evidence, a stolen Hyundai Elantra rammed into the front door and roll-up door of the business in order to gain entry. Four burglars subsequently went inside with bags and a suitcase, smashed display cases, and together stole 78 firearms before fleeing in another vehicle, later identified as a Chevrolet Equinox loaned to GILMORE ("the Equinox"). The burglars were wearing long pants, sweatshirts/jackets, hoods, masks, and gloves.

16. Law enforcement determined that the Hyundai Elantra used to ram into PWG was stolen earlier that morning in Lake Elsinore, California, which is the same city where CROSS and CAINE reside and where JOHNSON currently resides.

17. Around 3:00 p.m. that same day, the Equinox was located at a residence on Blue Rose Street, in North Las Vegas, Nevada 89081 (the "Blue Rose Residence"). Around 3:24 p.m., law enforcement observed Jahova Bell ("Bell") and Lanell Bellows ("Bellows") arrive at the Blue Rose Residence in an Uber, go inside for three minutes, and then leave in the same Uber. Law enforcement conducted a traffic stop, searched the car, and ultimately found two firearms stolen from PWG under the driver's seat and tucked beneath the rear floor mat. In separate Mirandized interviews, Bell and Bellows each admitted to possessing the firearms and admitted that they obtained the firearms inside the Blue Rose Residence and concealed the firearms in their clothing after leaving the Blue Rose Residence.

18. Meanwhile, soon after Bell and Bellows left the Blue Rose Residence, at 3:31 p.m., Semaje Ridgeway ("Ridgeway") and Ky'von Love Bernard Payne ("Payne"), also left the Blue Rose Residence, got inside the Equinox, and drove away. Both then went to Ventura Munitions in Las Vegas, Nevada, where they bought multiple firearm magazines and ammunition. Law enforcement continued to follow the Equinox, and subsequently conducted a traffic stop. During a search of the Equinox, law enforcement found GILMORE's Nevada driver's license, clothing matching those worn by the burglars in the PWG burglary, a hammer, and store tags consistent with those used by PWG to label their firearms.

19. Around 6:00 p.m., GILMORE and another individual ("Individual-1") arrived at the Blue Rose Residence. Around 7:08 p.m., a Chevrolet Camaro arrived at the Blue Rose Residence. The driver remained inside the Camaro while GILMORE got into the back seat of the Camaro. Individual-1 ran into the Blue Rose Residence, quickly returned, went to the trunk of the Camaro and moved some items before closing the trunk and getting inside the back seat of the Camaro. About one minute after the Camaro drove away from the Blue Rose Residence, GILMORE and Individual-1 got out of the Camaro and walked away. Law enforcement, in a marked vehicle, stopped GILMORE and Individual-1 on foot. After verifying their identities, law enforcement spoke with each one. GILMORE consented to a search of his pockets where law enforcement found a black ski mask consistent with the black ski masks worn in the PWG burglary earlier that morning.

20. Later that day, law enforcement obtained a state search warrant to search the Blue Rose Residence and found 33 firearms that were stolen from PWG that morning. In addition, law enforcement also found PWG tags and display rack hooks of the type that PWG used to display their firearms.

21. Based on preliminary checks, none of the firearms recovered were manufactured in California or Nevada. Preliminary checks on the recovered firearms confirmed that each firearm traveled in and/or affected interstate or foreign commerce. Further, because each of the 35 firearms - two recovered from Bell and Bellows and 33 recovered from the Blue

Rose Residence - were found in the State of Nevada after having been stolen from a business in the State of California, each firearm had traveled between states. Because the firearms were stolen from a business in California, specifically an FFL licensed to sell firearms, the possession of each firearm in Nevada subsequent to that traveled across state lines and therefore traveled in or affected interstate commerce.

22. On March 27, 2024, Payne, Ridgeway, Bell, and Bellows, were charged by criminal complaint filed in the United States District Court for the District of Nevada in Case No. 2:24-mj-303-BNW, which charged them with Transportation of Stolen Firearms in violation of 18 U.S.C. §§ 922(i) and 924(a)(2); Possession of Stolen Firearms in violation of 18 U.S.C. §§ 922(j) and 924(a)(2); and Trafficking in Firearms in violation of 18 U.S.C. §§ 933(a)(1) and 933(a)(2).

1. Cell Phone, Location Data, and Other Evidence

23. On March 25, 2024, at times between 1:18 a.m. and 1:47 a.m., location data for the Equinox, which was obtained pursuant to a federal search warrant, showed that the Equinox connected to a tower near or in the vicinity of the Courtney Lane Residence (as set forth below, believed to be CROSS's and CAINE's residence in Lake Elsinore, California). Location data for the Equinox showed that it traveled toward PWG from 2:17 a.m. to 3:08 a.m. At 3:08 a.m., the location data revealed the Equinox was approaching PWG.

24. Based on evidence obtained pursuant to a federal warrant, on March 25, 2024, at 1:34 a.m., a telephone number

associated to CROSS (i.e., CROSS's phone) received a call from a telephone number ending in -7967 and later found to be associated with GILMORE (i.e., GILMORE's phone). At 1:35 a.m., CROSS's phone connected with a telephone number ending in -4271, later found to be associated with JOHNSON (i.e., JOHNSON's phone).

25. Based on evidence obtained pursuant to a federal warrant, on March 25, 2024, at 3:34 a.m., CROSS's phone made an outgoing phone call. The location data for that call showed CROSS's phone in the area of Escondido, California, near or along I-15. At approximately the same time, the location data for the Equinox showed the vehicle in the same vicinity as CROSS's phone. At approximately 3:41 a.m., CROSS's phone received an incoming phone call. The location data for that call showed CROSS's phone in the same vicinity as the Equinox. At approximately 4:27 a.m., CROSS's phone made an outgoing phone call. The location data for that call showed CROSS's phone connected to a tower in the vicinity of the Courtney Lane Residence. The location data for the Equinox revealed that it was in the vicinity of the Courtney Lane Residence at approximately 4:09 a.m. and 4:18 a.m. At 4:35 a.m., CROSS's phone made an outgoing phone call to JOHNSON's phone.

26. Based on evidence obtained pursuant to a federal warrant, on March 25, 2024, at 3:31 a.m., GILMORE's phone called a telephone associated with Ridgeway (i.e., Ridgeway's phone). The call was not answered. GILMORE's phone called Ridgeway's phone several more times between 5:54 a.m. to 7:30 a.m., the

last of which was answered. Ridgeway's phone was also in contact with GILMORE's phone and a phone number associated with Payne (i.e., Payne's phone) in group calls between 8:13 a.m. to 8:26 a.m. Additional calls (completed and attempted) between GILMORE's phone and Ridgeway's phone occurred throughout the day.

27. Based on evidence obtained pursuant to a federal warrant, at 6:40 a.m., GILMORE's phone messaged Payne's phone, "I'm using Waze to drive to [Omitted] E Ann Rd, North Las Vegas, NV, arriving at 7:54 AM. Watch my drive in real-time on the Waze map!" Around 7:56 to 8:10 a.m. that morning, the Equinox was in the vicinity of that address. Based on this, I believe that one of the conspirators was driving the Equinox at the time it arrived at that address in North Las Vegas and that GILMORE was involved in the coordination of it. This address is about 4.5 hours after the Equinox left the PWG burglary. Based on Google Maps, the shortest distance between PWG and that address in North Las Vegas is 334 miles, which could take around 4.5 hours to drive if driven between 3:00 a.m. and 7:00 a.m. At 8:00 a.m., GILMORE's phone sent Payne's phone a pin drop for a location on North Blue Rose Street, which is about 200 feet from the Blue Rose Residence. I believe this again is consistent with GILMORE being involved in the coordination of the Equinox's travel.

28. Based on evidence obtained pursuant to a federal warrant, later in the day on March 25, 2024, GILMORE's phone messaged Ridgeway's phone, "Send pic of does two guns real

fast." In response, Ridgeway's phone sent GILMORE's phone a photograph of two pistols (image below). The depicted pistols bore serial numbers matching firearms stolen from PWG earlier that morning and recovered at the Blue Rose Residence later that day. GILMORE's phone replied, "Das smooove" "Lms all four?" ("lms" is slang for let me see) "And lay all my other guns out and send picc somebody tryna shop." Based on my training and experience, knowledge of the investigation and context of the conversation, I believe that GILMORE was taking ownership of all of the guns he directed Ridgeway to send pictures of and that he was trying to sell them.



29. Based on evidence obtained pursuant to a federal warrant, also later that day, a phone associated with Individual-1 (i.e., Individual-1's phone) messaged Payne's phone, "Send me Kenny shit to." Based on the investigation, I believe "Kenny" to be a reference to GILMORE. In response, Payne's phone sent a photograph depicting 14 firearms laid out (image below). One of the depicted firearms contained a serial number that matched one stolen from PWG that morning.



30. On March 25, 2024, CROSS's phone was in contact with Payne and Ridgeway repeatedly throughout the day. At 3:23 p.m., CROSS's phone was in contact with GILMORE's phone and Payne's phone in a call. Starting at 5:28 p.m., CROSS's phone repeatedly reached out to Payne's phone until around 7:50 p.m. that evening.

31. Based on a review of evidence obtained in the investigation, Payne's phone and Ridgeway's phone had many messages consistent with selling firearms on March 25, 2024.

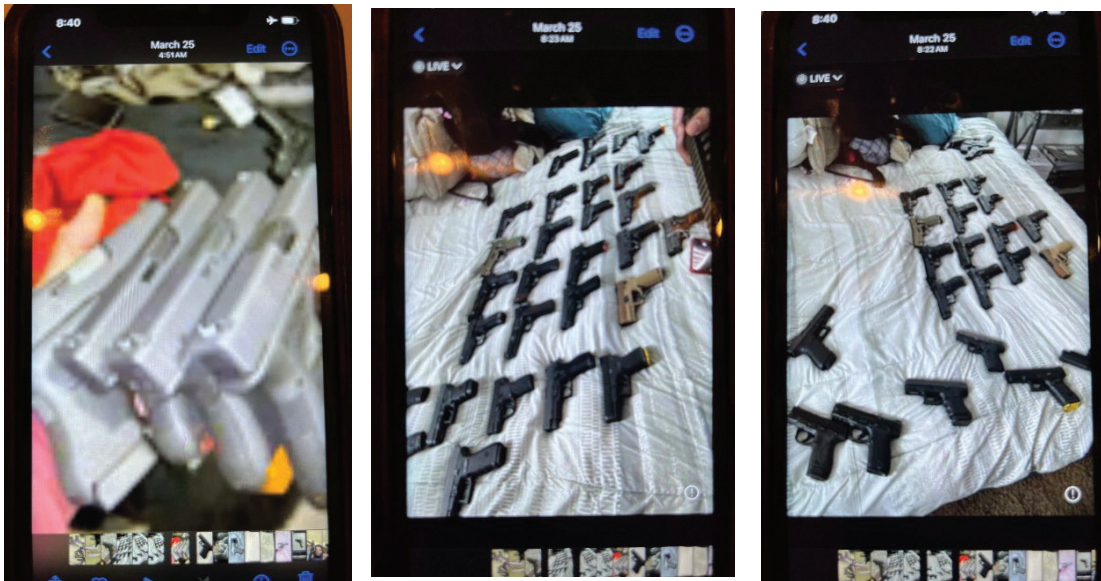
32. In addition, Payne's phone had an image of GILMORE's driver's license, with associated metadata showing a capture date of March 24, 2024, and latitude and longitude coordinates corresponding to the Courtney Lane Residence referenced below (the residence where CROSS and CAINE are believed to reside).

33. Payne's phone also had an image taken from Instagram account "risktakerc3" (believed to be CROSS's Instagram account)² that stated, "Dhzz shop back open" and tagged accounts: "ynd.kg" (believed to be GILMORE's Instagram

² This Instagram has the same handle as a Snapchat account that is linked to CROSS's phone.

account),³ "kay6ixx._" (believed to be Payne's Instagram account),⁴ and "ebkfrml13st". The file data for the image showed a creation date of March 25, 2024, at 12:25 p.m. UTC, which corresponds to March 25, 2024, at 5:25 a.m. PDT, which is roughly two hours after the burglary at PWG.

34. Based on the review of CAINE's cellphone, obtained pursuant to a federal warrant, the below images were located in stored images. The metadata associated with images indicated it was captured on March 25, 2024. The firearms depicted in the images match a few of the make and models of the firearms stolen during the PWG burglary.



³ GILMORE's phone number is linked to Tik Tok account "ynd.kg," which is the same handle name as the Instagram account.

⁴ In the user accounts located in Payne's phone, Instagram account "kay6ixx._" is listed.

2. Recoveries of Firearms Stolen from PWG

35. Since March 25, 2024, additional firearms that were stolen from PWG have been recovered by law enforcement in the Los Angeles area.

36. On April 8, 2024, a Beretta, M9A1, 9mm, pistol, with a serial number ending in CA2F, was recovered by the Los Angeles Police Department ("LAPD") in the area of Florence and Crenshaw, in Los Angeles, California, a known gang and narcotics area.

37. On April 9, 2024, a German Sports Guns, GSG-1911, .22 caliber, pistol, with a serial number ending in 7954, was recovered by LAPD at 6101 S. Broadway, in Los Angeles, California, a known gang and narcotics area.

38. On April 28, 2024, a Smith and Wesson, M&P Shield, 9mm, pistol, with a serial number ending in 1655, was recovered by LAPD in the area of 9th and Cabrillo Avenue, in San Pedro, California.

39. On May 15, 2024, a Glock, 30SF, .45 caliber, pistol, with a serial number ending in H002, was recovered by LAPD in the area of Florence and Crenshaw, in Los Angeles, California.

40. On May 29, 2024, a Glock, 19, 9mm, pistol, with a serial number ending in Z477, was recovered in Los Angeles during the course of a separate ATF investigation.

41. On July 13, 2024, during the search of the Courtney Lane Residence, a Glock 26 pistol was located. The serial number on the frame was scratched and difficult to read, as if someone tried to obliterate it. However, the serial number matches a Glock 26 stolen from PWG on March 25, 2024.

C. Ammo Bros Attempted Burglary on June 12, 2024

42. On June 12, 2024, there were two attempted burglaries within one hour of each other. Based on surveillance video, witness interviews and other evidence, at 4:30 a.m., five burglars attempted to break into Ammo Bros, a firearms store located at 780 S. Rochester Ave., Suite #B, in Ontario, California and licensed as an FFL. The burglars arrived in two vehicles and used one of the vehicles to reverse into the front of the store in an attempt to gain entry. The attempt was not successful. The burglars wore sweatshirts and/or jackets with hoods up, masks, gloves, and long pants and were carrying bags. One burglar was holding what appears to be a hammer in the surveillance video. One of the burglars had a Kappa sweatshirt, which consistent with clothing from other burglaries/attempted burglaries.

1. Further Investigation

43. Based on evidence obtained during this investigation, on June 12, 2024, at 2:18 a.m., an individual ("Individual-2") messaged a phone associated with GRAY (i.e., GRAY's phone), "Yall otw?" (on the way). Shortly after, GRAY's phone replied with, "soon, send me the address, RN" (right now). Individual-2 responded, "Ontario ammo bros, still no whip?" ("whip" is a common term for vehicle). GRAY's phone replied, "[Individual-3] got it." Individual-2 responded, "Bet,⁵ follow this," and dropped a pin for an address located at 1311 E. Wannamaker Ave.,

⁵ I know that "bet" is slang for "okay."

Ontario, California 91761, which corresponds to a commercial area about 0.6 miles from Ammo Bros. GRAY's phone responded, "Bet". Based on my training and experience, knowledge of this investigation and context of this conversation, this would be consistent with GRAY and Individual-2 coordinating a meeting location as a staging area before traveling to the burglary location. Individual-2 soon after messaged, "Actually don't come over here bc u in Kenny js⁶ lmk when u close. My phone finna die if I don't text back in at this lo I sent u." Based on my training and experience, knowledge of this investigation, and context of this conversation, I believe that Individual-2, GRAY, and "Kenny" (i.e., GILMORE) were coordinating their travel just before the Ammo Bros attempted burglary.

D. Fallbrook Guns and Ammo Attempted Burglary on June 13, 2024

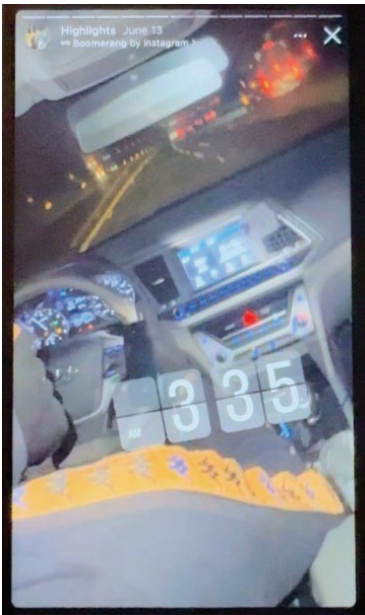
44. Based on surveillance video, witness interviews and other evidence, on June 13, 2024, between 3:51 a.m. and 3:58 a.m., five burglars attempted to break into and burglarize Fallbrook Guns and Ammo, a firearms store located at 1032 South Main Ave., in Fallbrook, California and an FFL ("Fallbrook"). The suspects attempted to use a stolen Hyundai Elantra to break into Fallbrook by reversing it into the storefront multiple times. Ultimately, they were unsuccessful in gaining entry and they fled in another stolen vehicle. The burglars wore sweatshirts and/or jackets with hoods up, masks, gloves, and long pants. One of the burglars wore a Kappa sweatshirt

⁶ "Js" is shorthand for "just saying."

consistent with the one worn by someone involved in the Ammo Bro attempted burglary on June 12, 2024, and consistent with the sweatshirt in a story posted on CROSS's Instagram account (handle "risktakerc3"), discussed further below.

1. Further Investigation

45. In an Instagram "highlight" (a story highlight that remains longer than 24 hours on Instagram) on June 13, 2024, Instagram account "risktakerc3" (believed to be used by CROSS, see footnote 2 above) posted a photograph of an individual driving a Hyundai wearing a Kappa sweatshirt, a mask over their face, and gloves with a time of 3:35 a.m. added over the story, which corresponds to about 15 minutes before the Fallbrook attempted burglary.



Instagram Highlight



Still image from Fallbrook

46. On June 13, 2024, during the time of the Fallbrook attempted burglary, location data for CROSS's phone, obtained

pursuant to a federal warrant, indicated it was in the area of Fallbrook Guns and Ammo.

E. Firearms Unknown Burglary on June 17, 2024

47. Based on surveillance video, witness interviews and other evidence, on June 17, 2024, at 3:22 a.m., Firearms Unknown, an FFL located at 1906 Oceanside Blvd., Suite K, in Oceanside, California, was burglarized. A stolen vehicle was used to ram into the storefront of the building. Three burglars then got out of the vehicle and went inside wearing hooded sweatshirts, masks, long pants, gloves, and carrying bags. The burglars broke display cases with an object that appeared to be a hammer and grabbed firearms from the wall and display cases. They exited the store at approximately 3:24 a.m. with firearms in their bags and hands and fled in another stolen vehicle operated by a fourth conspirator. In total, 33 firearms were stolen.

48. Based on an inventory of the firearms stolen provided to law enforcement by Firearms Unknown and preliminary checks of those firearm manufacturers, at least one of the firearms was manufactured outside of California, and therefore, in order to be at Firearm Unknown's business, had necessarily been transported in interstate and/or foreign commerce.

1. Further Investigation

49. Based on the review of CAINE's cellphone, obtained pursuant to a federal warrant, the below images were located in stored images. The metadata associated with images indicated it was captured on June 17, 2024. Both images depicted multiple

firearms laid out. One of the images included a Kimber pistol with a visible serial number that matches a Kimber pistol stolen from Firearms Unknown on June 17, 2024. The second image included an FN pistol, a Glock 31, and Glock 29, which are consistent with makes and models of firearms stolen from Firearms Unknown on June 17, 2024.



F. Ammo Bros Burglary on June 18, 2024

50. On June 18, 2024, around 4:30 a.m., based on video footage, witness interviews, and other evidence, Ammo Bros, an FFL located at 10031 Indiana Ave., in Riverside, California, was

burglarized. Based on video surveillance footage, witness interviews, and other evidence, two stolen vehicles arrived at the store together. One vehicle was used to ram into the building. Four burglars got out of the vehicles and entered the store wearing sweatshirts and/or jackets with hoods up, masks, long pants, and gloves, and carrying several bags. An additional conspirator remained inside one of the vehicles as the getaway driver. Shortly after, all four left in the vehicle with the getaway driver and they fled. In total, 25 firearms were stolen. Based on video footage, one of the burglars wore plaid pants similar to pants in an Instagram story posted on CROSS's "risktakerc3" Instagram account, as detailed below.

51. Based on an inventory of the firearms stolen provided to law enforcement by Ammo Bros and preliminary checks of those firearm manufacturers, at least one of the firearms was manufactured outside of California, and therefore, in order to be at Ammo Bro's business, had necessarily been transported in interstate and/or foreign commerce.

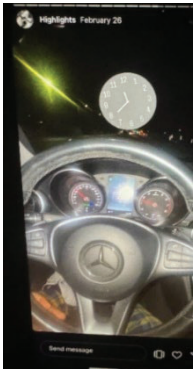
1. Further Investigation

52. Instagram account "risktakerc3" (believed to be used by CROSS, see footnote 2 above) posted a story highlight on February 26, 2024, depicting an individual driving a vehicle and wearing plaid pants consistent with the pants of one of the burglars.

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*Highlight from
February 26*

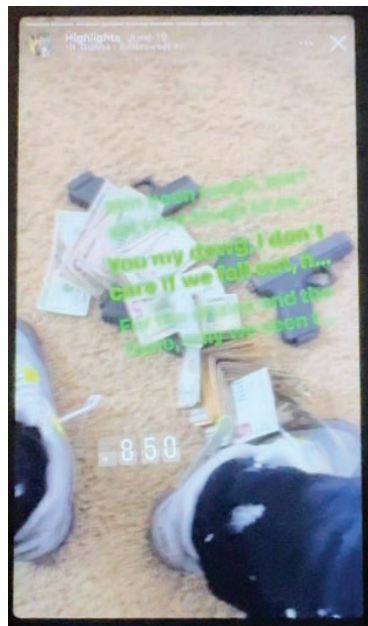


*Close up of pants in
February 26 story*



*Suspect-Ammo Bros
(Riverside)*

53. On June 19, Instagram account "risktaker3" posted a story depicting cash as well as three firearms with a time of 8:50 added over the original story. This was the day after the burglary at Ammo Bros and two days after the burglary at Firearms Unknown.



G. Camarillo Gun Store Burglary on July 1, 2024

54. On July 1, 2024, at 4:17 a.m., based on video footage, witness interviews, and other evidence, Camarillo Gun Store, an

FFL located at 1780 East Ventura Boulevard, in Camarillo, California, was burglarized. Video surveillance footage showed that one stolen vehicle arrived at the store at around 2:40 a.m. Around 4:05 a.m., another stolen vehicle arrived. The first vehicle then rammed the glass of the front doors of the store about four times in order to gain entry. Three burglars got out of the vehicles and went inside wearing hooded sweatshirts, masks, and gloves, and were carrying bags. The burglars smashed display cases and in total, stole 63 firearms. The burglars left about 90 seconds later in the other stolen vehicle, which they later abandoned. One of the burglars wore a black sweatshirt with the words "HOODRICH" on the back, consistent with a sweatshirt later found at CROSS's and CAINE's residence and believed to be worn by HAWKINS, as detailed below.



55. In addition, one of the burglars wore uniquely colored pants and was seen on the video with a hammer in hand, appearing to smash a display case. Those pants were found at the Courtney Lane Residence, as discussed below.



56. Based on an inventory of the firearms stolen provided to law enforcement by Camarillo Gun Store and preliminary checks of those firearm manufacturers, at least one of the firearms was manufactured outside of California, and therefore, in order to be at Camarillo Gun Store's business, had necessarily been transported in interstate and/or foreign commerce.

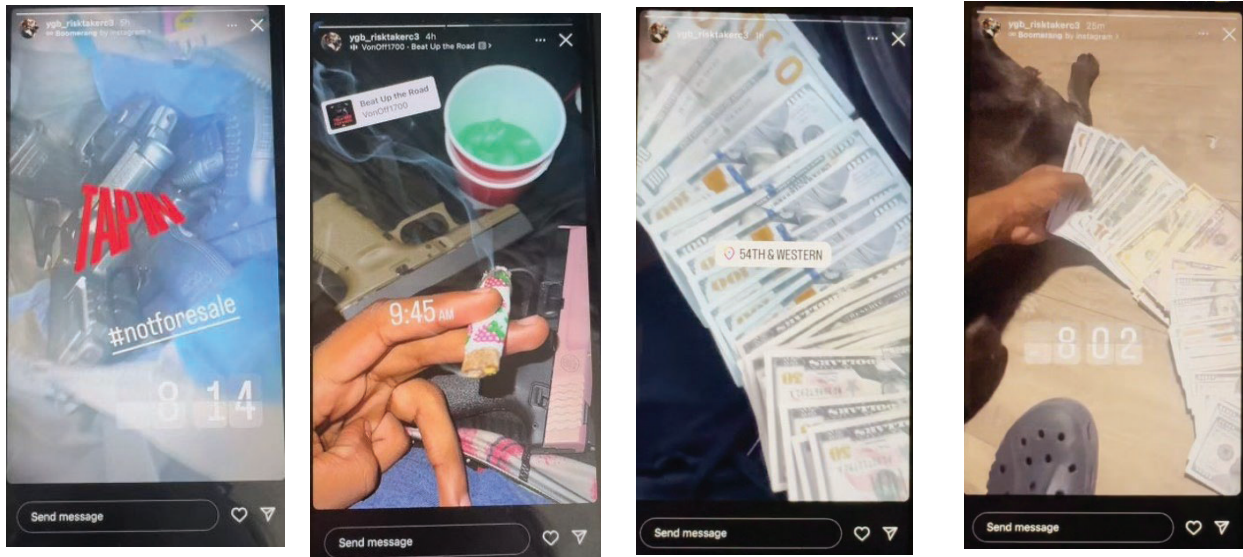
1. Further Investigation

57. On June 29, 2024, law enforcement observed that the username for Instagram account "risktakerc3" (believed to be used by CROSS) was changed to "ygbrisktakerc3" and on June 30, 2024, law enforcement observed that the username was changed to "ygb_risktakerc3".

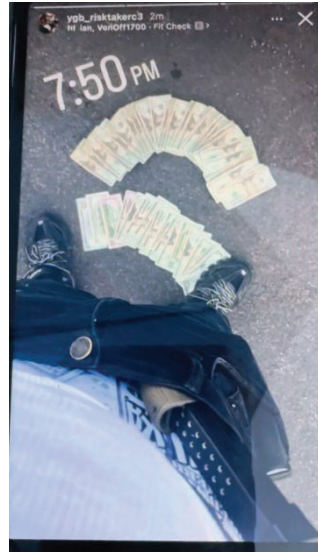
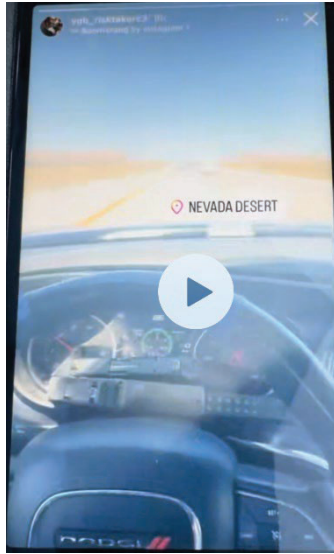
58. On July 1, 2024, "ygb_risktakerc3" (believed to be used by CROSS based on the above) posted a story showing

multiple handguns with the time 8:14 a.m., "TAP IN" and "#notforesale" over the top of the story. This post was only hours after a burglary at Camarillo Gun Store. Additional stories posted throughout July 1 included an image of two handguns with the time 9:45 a.m. added onto the image, a video of a line of cash with the location 54th and Western added onto the video, and another video of a line of cash laid out on the floor with the time 8:02 p.m. added onto the video. Based on my training and experience, the posted stories showing money laid out are consistent with social media posts done by individuals that are showing the profits made from sales of illegal goods.

59. On July 2, 2024, I went to the Camarillo Gun Store and spoke to the owner. I showed the owner the Instagram post at 9:45 a.m. depicted below (second photo), with the two firearms and a hand. I focused on the black firearm with a pink slide because based on my training and experience, that is a unique color combination for a firearm. I asked the owner if he recognized the firearm on the right in the photograph, which was a black firearm with a pink slide. The owner recognized that firearm as being one that was stolen from his store and was one that he provided in the list of stolen firearms that he gave to law enforcement.



60. On July 2, 2024, "ygb_risktakerc3" posted a story of cash and four firearms. Two of the firearms appear to be the same firearms as in one of the July 1, 2024 posts. On July 4, 2024, "ygb_risktakerc3" posted a story of a Dodge vehicle (CROSS is the registered owner of a Dodge Charger) driving on a road with a location tag "Nevada Desert" added to the story. Above the steering wheel is a pistol with an extended magazine and what appears to be a second pistol. Later that day, account "ygb_risktakerc3" posted a story of the legs and waistband of an individual standing with the end of a pistol grip with an extended magazine visible in the waistband of the pants and cash laid out at the individual's feet.



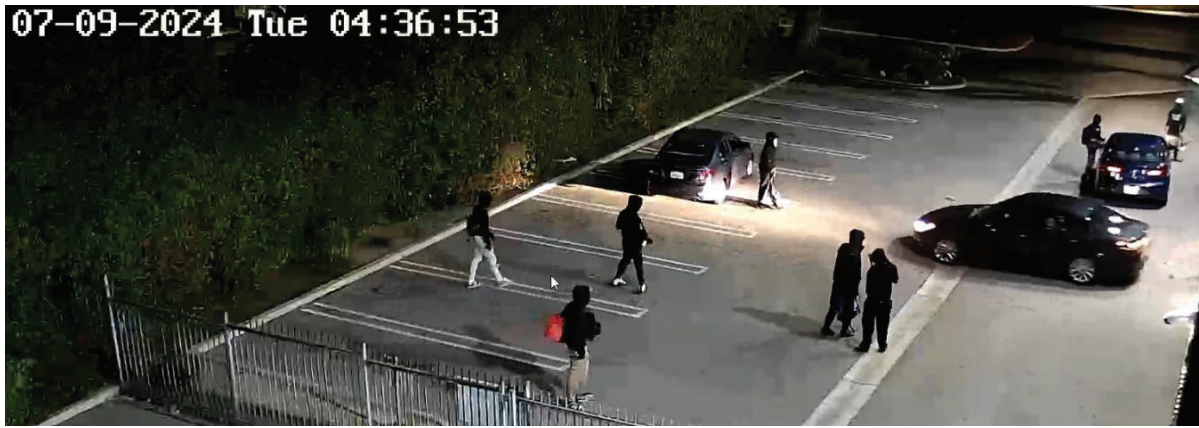
61. Based on a review of messages obtained pursuant to a federal warrant, GRAY's phone was communicating with another individual ("Individual-4") about firearms believed to be stolen from the Camarillo Gun Store on July 1, 2024. Specifically, on July 1, 2024, at 4:48 p.m., Individual-4 asked, "8 g mans' for 5k ask Kenny" "or what would he do for 8" and in response, GRAY's phone messaged, "He said fuck no." Based on my training and experience, knowledge of this investigation, and context of this conversation, I believe that Individual-4 was asking GRAY if Kenny (i.e., GILMORE) would sell eight Glock firearms for \$5,000, and GRAY responded that he (meaning, GILMORE) would not. Individual-4 then asked, "what would he do for 6" and GRAY's phone responded, "He said 6" "For 5k." Later in the conversation on July 2, 2024, Individual-4 asked, "lemme get a pic of the p22" and in response, GRAY's phone sent a photograph of seven guns." At 7:36 p.m., GRAY messaged, "They just sold." Individual-4 then asked, "what else u got" "price," and GRAY's

phone responded with a list: XD 650; 9x19 800; Sig 500; Other sig 650; 45- 700. I later contacted the owner of the Camarillo Gun store and provided the owner with the photograph as well as the list of firearms sent by GRAY's phone, and the owner informed me that all of the firearms were consistent with the types of firearms that were stolen from Camarillo Gun Store.

62. On July 13, 2024, at the Courtney Lane Residence, a Glock 21 pistol, Glock 19 pistol, and an HS Produkt Hellcat with serial numbers matching firearms stolen from the Camarillo Gun Store were found.

H. Smokin Barrel Gun Store Attempted Burglary on July 9, 2024

63. On July 9, 2024, at 4:33 a.m., approximately nine burglars attempted to break into and burglarize Smokin Barrel Gun Store, an FFL located at 1775 Surveyor Ave., in Simi Valley, California. Based on video footage, witness interviews, and other evidence, three vehicles pulled into the parking lot of the business and eight burglars got out wearing long pants, masks, and hooded sweatshirts or jackets, and carrying bags. One burglar remained in one of the vehicles and used it to ram into the front of the business in order to gain entry but was unsuccessful, the burglars left. That vehicle was later found crashed in bushes and abandoned, and police determined it had been stolen. There were over 700 firearms inside the business.



1. Further Evidence

64. Based on evidence obtained pursuant to warrants, on July 8, 2024, starting at 10:30 p.m., CROSS's phone and GILMORE's phone moved out of the Lake Elsinore and Murrieta area and travelled into Ventura County. Location data for both phones indicated that the phones were in the area of Oak Park from 2:05 a.m. to 3:05 a.m. on July 9, 2024. The location data for GILMORE's phone indicated it moved toward the city of Simi Valley. At 4:35 a.m., location data for GILMORE's phone indicated it was in the area of Smokin Barrel Guns with a radius of 538 meters. Location data for CROSS's phone showed that at 3:55 a.m. on July 9, 2024, the phone was in the area of Thousand Oaks (Thousand Oaks and Simi Valley are neighboring cities in Ventura County). All data points after that until 5:05 a.m. indicated "absent subscriber." At approximately 5:05 a.m., the location data indicated that CROSS's phone was in the area of Thousand Oaks. Based on my training and experience and communications with other law enforcement, this is consistent with the phone being turned off, in airplane mode, or disconnected from the cellular network. The "absent subscriber" timeframe appears to also be enough time for travel to Smokin

Barrel in Simi Valley, attempt to break in, and travel back to Thousand Oaks area. Location data for CROSS's phone and GILMORE's phone later indicated that the phones returned to the Lake Elsinore area at approximately 7:00 a.m.

65. Based on evidence obtained pursuant to a federal warrant, on July 9, 2024, at 5:47 a.m., "Threezy", using a telephone phone number associated with JOHNSON (i.e., JOHNSON's phone), sent a message to CAINE's phone asking him to get his chain from another individual. JOHNSON's phone followed up with, "i went to go pass n left my chain w her." Based on my training and experience, a "pass" is a slang term for a robbery or burglary. Based on my knowledge of this investigation and the context of this conversation, I believe that JOHNSON was telling CAINE that he went to the Smokin Barrel Gun Store attempted burglary and that he sent this message to CAINE after it.

I. Fowler's Gun Room Burglary on July 13, 2024

66. Based on video surveillance footage, witness interviews, and other evidence, on July 13, 2024, at 4:00 a.m., a Lexus associated with GILMORE was in the Orange County area in the vicinity of a neighborhood located approximately one mile from Fowler's Gun Room ("FGR"), and FFL located at 358 S. Tustin St., in Orange, California. Based on my training and experience and knowledge of this investigation, this is consistent with this group's modus operandi of searching neighborhoods for vehicles to steal before conducting a burglary.

67. Based on evidence obtained pursuant to warrants, CROSS's phone and GILMORE's phone traveled to an area in the vicinity near FGR at around 5:00 a.m., which is when FGR was burglarized. Surveillance video showed a stolen vehicle was used to ram the front entrance of FGR. The burglars went inside wearing long pants, hooded jackets or sweatshirts, gloves, and masks, and were carrying bags. The display cases were broken and over 80 firearms were stolen. Two other stolen vehicles were also used in the burglary, and, based on video footage, approximately seven burglars were involved.

68. Based on an inventory of the firearms stolen provided to law enforcement by Fowler's Gun Room and preliminary checks of those firearm manufacturers, at least one of the firearms was manufactured outside of California, and therefore, in order to be at Fowler's Gun Room business, had necessarily been transported in interstate and/or foreign commerce.

69. Following the burglary, CROSS's phone and GILMORE's phone traveled to the vicinity of a residence located on Courtney Lane, in Lake Elsinore (the "Courtney Lane Residence"), and believed to be where CROSS and CAINE reside and where JOHNSON currently resides. Around 8:00 a.m., CROSS's phone was in the vicinity of a park in Lake Elsinore and then went to another residence. Law enforcement observed CROSS exit that residence. CROSS then traveled back to the vicinity of the Courtney Lane Residence. GILMORE's phone appeared to remain in the vicinity of the Courtney Lane Residence the entire time. Shortly thereafter, law enforcement froze the scene at the

Courtney Lane Residence, conducted a protective sweep, and obtained a federal search warrant to search it, along with five vehicles parked in and around the residence. When law enforcement arrived at the Courtney Lane Residence, they made their presence known at the front of the residence by activating their emergency red and blue lights, wailing the siren, and making announcements over a public address speaker on one of the unmarked police vehicles. As soon as this happened, law enforcement observed an occupant in the downstairs front bedroom look out of the blinds. Moments later, law enforcement observed occupants fleeing from the back of the residence. The fleeing occupants went towards other residents' backyards. Both were later detained and identified as GILMORE and CROSS. With respect to the Courtney Lane Residence, after making their presence known, law enforcement ordered the remaining occupants out of the residence. CAINE, JOHNSON, HAWKINS, and the parents of CROSS and CAINE exited the residence. Shortly thereafter, law enforcement conducted a protective sweep, froze the scene, and obtained a federal search warrant to search the Courtney Lane Residence, along with five vehicles parked in and around the residence.

70. On July 13, 2024, at 10:00 a.m., an individual who is a resident in the neighborhood where the Courtney Lane Residence is located ("Witness-1"), contacted ATF to alert them about a firearm that had been located in their backyard. Witness-1 stated that two subjects were seen fleeing through the yard. After seeing a subject detained and going outside for about 30

minutes, Witness-1 stated they went back inside the house and observed their grill pit lid was open. When Witness-1 went to close it, Witness-1 observed a firearm had been placed on the grill. Witness-1 gave permission to ATF to go inside and recover the firearm, which was later identified as a Glock 19 pistol that had been stolen from FGR.

71. On July 13, 2024, the Honorable Magistrate Judge Steve Kim authorized a federal search warrant for the Courtney Lane Residence and five vehicles in and around it. During the search of the interior of the Courtney Lane Residence, law enforcement recovered approximately 61 firearms, including firearms in CROSS's room, CAINE's room, and the room that JOHNSON was staying in. As noted above, one firearm was discovered to have been stolen in the March 25, 2024 PWG burglary, one was discovered to have been stolen in the October 9, 2023 Chaparral Coin and Gun burglary, and three were discovered to have been stolen in the July 1, 2024 Camarillo Gun Store burglary. Of the remaining firearms, at least 45 of them have been discovered to have been stolen from FGR that morning. At this time, not all firearms have been processed and compared to known stolen firearms from the burglaries. Law enforcement also found in the Courtney Lane Residence the pants consistent with those discussed in paragraph 55 above, gloves, masks, a hammer, head lamps, bags that had firearms inside along with broken glass (consistent with them being taken out of display cases), a "HOODRICH" sweatshirt consistent with one worn in the burglaries discussed above, and a backpack that matches one observed in

surveillance video from FGR. Inside the backpack was a FGR price tag for a firearm.

72. On July 13, 2024, while conducting surveillance at a location in Murietta where a car relevant to this investigation was parked and believed to be where GRAY lives (the "GRAY residence"), law enforcement observed a vehicle arrive outside of the GRAY residence with two individuals, Individual-5 and Individual-6. Individual-6 got out of the vehicle and went to the gate of the GRAY residence and, after a short time, returned to the vehicle carrying a bag. A traffic stop was conducted on this vehicle and eight firearms were located inside. One firearm was in the glovebox of the vehicle, another was on the front passenger seat floorboard, and the remaining were still in the bag carried by Individual-6. Of these eight firearms, one was discovered to be stolen from Firearms Unknown on June 17, 2024 and six were discovered to be stolen from FGR on July 13, 2024.

J. Statements

73. On July 13, 2024, in a Mirandized interview, GRAY admitted to participating in the FGR burglary by dropping off and picking up individuals in vicinity of the burglary. GRAY admitted to dropping off individuals at the Courtney Lane Residence following the burglary. Once at the Courtney Lane Residence, other individuals placed an unknown number of firearms into a bag for him to hold. Later that day, GRAY contacted another individual to pick them up from him as he did not want them in his house. Later in the interview, GRAY

admitted to participating in the July 9, 2024, attempted burglary at Smokin Barrel in Simi Valley, California. Based on a review of GRAY's phone, there were several Facetime calls around the time of the burglaries. Some of the phone numbers associated with those calls come back to "K3", i.e., JOHNSON, "Kenny," i.e., GILMORE, and "C3," i.e., CROSS.

74. CAINE told law enforcement that he had been home all night from July 12 to July 13, 2024, except for a short time that he went to go get food with JOHNSON at Jack in the Box. After CAINE returned back to the Courtney Lane Residence, he and JOHNSON went to their separate rooms. CAINE confirmed his bedroom and JOHNSON's bedroom are next to each other on the first floor separated from the rest of the Courtney Lane Residence by another door.

75. CAINE told law enforcement that he was woken up by his dad knocking to open the door for the police (who were there to conduct a protective sweep of the home in anticipation of a search warrant). CAINE stated that when heard the police, he came out of his room and saw bags with guns in them on the floor in the hallway. CAINE confirmed when he was walking out, that JOHNSON, and an individual he did not know the name of but who was later identified as HAWKINS, were with him. CROSS and "Kenny" (identified as GILMORE) were not with them. This is consistent with CROSS and GILMORE fleeing the house when police arrived.

76. On July 13, 2024, in a Mirandized interview, JOHNSON stated he had been at the Courtney Lane Residence from the night

of July 12 to July 13. JOHNSON confirmed his room on the first floor closest to the front of the house and CAINE'S as being the first just before his. JOHNSON explained he went to bed and woke up around 9/9:30 a.m. and heard CROSS coming in with his friends. JOHNSON said he got up and went to CAINE's room and knocked on the door. Later, JOHNSON explained that CROSS and CAINE's father knocked on the door and spoke to them about the laundry room. Shortly after, police arrived. JOHNSON denied seeing any firearms on the floor at the time of exiting the house when law enforcement showed up. Later, JOHNSON changed his statement and said he was asleep upstairs and came downstairs before CROSS came back with friends. Then he later said that CROSS and his friends did not go in his room on July 13 at all, but then said they had been in there without him. JOHNSON first stated that he did not have any firearms, but then later said he had one firearm under his bed, and later said he had two firearms under his bed.

K. Additional Firearms Evidence

77. The Instagram account "risktakerc3" is believed to be used by CROSS because part of the handle references "C3," which is CROSS's nickname, and it is also the same handle as a Snapchat account that is linked to CROSS's phone.

78. CROSS's Instagram account "risktakerc3" had images in the "highlights" section that showed men who I recognize to be Payne and CROSS together on March 17, 2024 and February 25, 2024, with firearms in their hands or pockets (images below).

Both images match images sent from Payne to CROSS and which were located on Payne's phone.



Instagram "risktaker3" Highlight from February 25 compared to image sent to CROSS's phone from Payne's phone on February 25, 2024 and Highlight from March 17 compared to image sent CROSS's phone from Payne's phone on March 17, 2024, respectively.

L. Financial Damages

79. A preliminary estimate of the property damage to the firearm stores and losses associated with the stolen firearms has been obtained from the respective stores. Based on the preliminary information, I learned the following:

80. Chaparral Gun and Coin estimated their inventory loss at \$25,000 and property damage and repairs of \$10,000. The total amount of damages is approximately \$35,000.

81. Poway Weapons and Gear estimates property damage at around \$60,000. This total does not include the inventory missing.

82. Camarillo Gun Store states an inventory loss of \$46,093 and \$80,000 in property damages, for a total of approximately \$126,093.

83. Smokin Barrel estimates structural damage at about \$30,000.


84. Fowlers Gun Room estimates an inventory loss of \$115,000 and \$111,000 in structural damages, construction costs, and other damages. Total estimated cost approximately \$226,000.

V. CONCLUSION

85. For all of the reasons described above, there is probable cause to believe that Cross Arjay GOREE, also known as "C3," Kenneth GILMORE III, aka "Kenny," Brendan Markel HAWKINS, Calvin Logan GRAY, Kendall Eric JOHNSON, aka "K3," and Caine Aiden GOREE have committed a violation of 18 U.S.C. §§ 371, 922(u): Conspiracy to Steal Firearms from the Premises of a Federal Firearms Licensee.

/s/
JANNAH R. HOLDEN,
ATF Special Agent

Subscribed to and sworn before me
this 15th day of July, 2024.



THE HONORABLE STEVE KIM
UNITED STATES MAGISTRATE JUDGE